

Clint Odom
Director
Federal Regulatory



1300 I Street, NW, Suite 400 West
Washington, DC 20005

Phone 202 515-2535
Fax 202 336-7922
clint.e.odom@verizon.com

April 4, 2002

Mr. William Caton
Acting Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Application by Verizon-New Jersey Inc. for Authorization To Provide In-Region, InterLATA Services in State of New Jersey, Docket No. 02-67

Dear Mr. Caton:

This letter responds to Staff's request for additional information concerning the generation of completion notifiers by Verizon's systems.

As we explained in our Supplemental Application, a CLEC's order (called a local service request or LSR) generates one or more internal service orders within Verizon's systems to accomplish the different steps that need to be done to complete the CLEC's request. Notifiers, however, are generated at the LSR level. We describe below how Verizon's systems process the service orders and notify the CLECs that the provisioning work and billing updates have completed – i.e., how PCNs and BCNs are generated.

When a Verizon technician completes work steps for an order requiring physical work either in the field or in the central office, he or she notifies the administrative system that assigns jobs and manages the work force (called Work Force Administration, or WFA). For most orders requiring physical work, WFA updates the service order processor to show that the work has been completed. *See* McLean/Wierzbicki/Webster/ Canny Supplemental Decl. ¶ 14. This process generally occurs throughout the day as the technicians complete their work.

For orders that do not require physical work, such as feature/translation changes, the service order processor is automatically updated by WFA during overnight processing. *See* McLean/Wierzbicki/Webster/Canny Supplemental Decl. ¶ 14. These orders also include, for example, orders that disconnect an end user's account from Verizon retail so that it can be added to a CLEC's master account and orders that add an end user's account to the CLEC's master account. This "auto-completion" process is a "batch process" that runs beginning at 8:00 p.m. each business day.

At 5:00PM each business day, the service order processor creates a file with all service orders that were work completed that day. (Since orders that are work completed through the "auto-complete" process are completed in a batch process that begins at 8:00 p.m., they will be in the service order processor file at 5:00 the next business day.)

A batch process is a common data processing method for processing large volumes of data, and particularly when passing large volumes of data between systems. Generally speaking, a file of input records is read and processed through of a series of edits and algorithms contained in one or more programs that process in a defined sequence. The time it takes a batch process to run is affected by the amount of processing logic performed and the number of records processed. In general, the batch processes described here run for hours. The batch begins with the processing of the first record in the input file and ends with the processing of the last record in the input file.

The input records in this discussion are service orders. The service orders are processed in the sequence they appear in the input file. The file contains both retail and wholesale orders. The service orders in the file are sorted by Billing Telephone Number, then Service Order Type within Billing Telephone Number. For many years (since well before the 1996 Act and the advent of local competition) the sort sequence for Service Order Type has put orders associated with putting a customer in service (for example, new connect orders and orders to add features or services to a customer's account) ahead of disconnect orders, or orders that involved a records change.

As noted above, for many local service requests from CLECs, there are multiple internal service orders associated with a single LSR. This is unlike retail orders, which with only a few exceptions, involve only a single service order. *See McLean/Wierzbicki/ Webster Reply Decl. ¶ 31.* Service orders must be processed in a particular sequence. For example, a "new connect" order ("N" order) that adds an end user to a CLEC's master account cannot be processed by the billing system until the "disconnect" order ("D" order) that removes the account from Verizon retail has processed. If the internal service orders are presented out of sequence, the system will "re-cycle" them to put them in sequence. *See id.* Because the update of the billing system is a batch process, a service order that gets "re-cycled" will wait at least 24 hours (until the next batch is run) before it updates the billing system.

As part of its examination of results for various performance measures in New Jersey, Verizon's wholesale organization investigated the effect of the sequence in which orders were presented to the billing system. The effect of this sequencing and re-cycling for many wholesale requests (for example, migrations which require disconnection of the end user from Verizon or another CLEC before connection to the winning CLEC) was to add 24 hours (or more) to the time it takes for orders to update the billing system in New Jersey and subsequently for the billing completion notifier to be generated.

On March 18, 2002, Verizon changed the sequencing of orders in the files assembled by the SOP each day. This change applies to both retail and wholesale, and now sorts the orders so that disconnect orders are in the sequence ahead of new connect orders.

Verizon expects that this change will reduce the time required by the systems to produce the billing completion notifier for an LSR involving requesting the migration order types involving D & N orders. How this affects monthly CLEC-aggregate results or individual CLEC results depends on how frequently this condition was and is encountered in a particularly month.

Sincerely,



cc: Brent Olson
Alexis Johns
Susan Pie